

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CHARLES BRETT, BUILDING)
INSPECTOR OF TOWN OF HAMILTON,)
Plaintiff,)

C.A. No. 05-11542 RGS

v.)

IRINA V. TEMKINA,)
Defendant.)

PROPOSED DISCOVERY SCHEDULE

1. Defendant shall serve and file her initial disclosures by March 17, 2006.
2. Non-expert discovery including all depositions but excepting requests for admissions shall be completed by June 30, 2006.
3. Expert disclosure, including identification of all expert witnesses and any and all written reports prepared by such expert witnesses, shall be made by Plaintiff by June 30, 2006, and by Defendant by July 31, 2006.
4. Expert Depositions: Each party, at its discretion, shall be entitled to conduct no more than one (1) Deposition of each expert witness disclosed. All expert depositions shall be conducted no later than September 29, 2006.
5. Request for Admissions shall be completed by September 29, 2006.
6. Motions for Summary Judgment shall be filed no later than October 20, 2006.
7. Pre-trial conference to be scheduled by the Court.

This Scheduling Plan may be amended at the consent of all parties, or upon Motion and Order of the Court in accordance with L.R. 16.1(G).

CERTIFICATE OF SERVICE

I hereby certify that this document (with attached affidavit of Donna Brewer MacKenna) filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non registered participants on February 22, 2006.

/s/ Donna Brewer MacKenna

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DISTRICT OF MASSACHUSETTS

_____)	
CHARLES BRETT, BUILDING)	
INSPECTOR OF TOWN OF HAMILTON,)	C.A. No. 05-11542 RGS
Plaintiff,)	
)	
v.)	
)	
IRINA V. TEMKINA,)	
)	
Defendant.)	
_____)	

AFFIDAVIT OF DONNA BREWER MacKENNA

1. I am the attorney for plaintiff Charles Brett, Building Inspector of the Town of Hamilton and a member of the bar of this court.
2. Pursuant to this Court's Order of January 23, 2006, I prepared and served upon the *pro se* defendant and co-counsel for Mr. Brett the Proposed Discovery Schedule to which this Affidavit is attached.
3. Co-counsel for Mr. Brett has agreed to this schedule.
4. I served the proposed discovery schedule on Ms. Temkina by email (irina.temkina@uconn.edu) and first class mail on February 17, 2006.
5. As of this date and time, Ms. Temkina has not provided any comments to me with regard to this proposal.

SIGNED UNDER PENALTIES OF PERJURY THIS 22ND DAY OF
FEBRUARY, 2006.

/s/ Donna Brewer MacKenna
DONNA BREWER MacKENNA